

REMARKS/ARGUMENTS

In the most recent Office Action, claims 1-7 were examined. Claims 1-7 stand rejected. Accordingly, claims 1-7 are pending in the present application. No new matter is added.

Applicants thank the Examiner for the thorough search and consideration of the application, and respond to the comments in the Office Action as follows.

CLAIM REJECTIONS - 35 U.S.C. §103

The Office Action states that claims 1-7 are rejected under 35 U.S.C. §103(a) as being unpatentable over Hale et al. (U.S. Patent No. 5,343,382) in view of Ashley et al. (U.S. Patent No. 5,245,261). In particular, the Office Action states that the disclosures by Hale et al. and Ashley et al. teach all of the claim limitations in claims 1-7 in an obvious combination.

Applicants respectfully traverse the rejection.

The Office Action notes that Hale et al. fail to disclose a conductive plate and insulation, as is recited in the claims of the present invention. Applicants also note that Hale et al. fail to teach or suggest a control IC “having output terminals connected to said control electrodes of said high side MOSFETs,” as well as the limitation of the first and second high side MOSFETs and IC are all supported on a conductive support plate.

These limitations are also not shown in the disclosure by Ashley et al. Ashley et al. appear to teach a silicon chip that is not conductive where two transistor halves are mounted (col. 5, lines 65-col. 6, line 15). While the silicon chip by Ashley et al. appears to have a conductive layer, this layer serves only as a heat sink (col. 6, lines 12-15). In addition, neither Hale et al. nor Ashley et al. teach or suggest a common insulation housing enclosing the first and second high side MOSFETs and IC, as is recited in the claims of the present invention. Because the cited prior art references do not teach or suggest all the claim limitations, either alone or in combination, that are recited in claims 1-7 of the present application, a *prima facie* case of obviousness cannot be established.

In addition, Applicants respectfully submit that it would not be obvious to combine the disclosures by Hale et al. and Ashley et al., since Hale et al. appear to teach an H-bridge for current control, while Ashley et al. appear to teach a current detector. That is, even if it were true that Hale et al. suggests improving heat conduction in the disclosed H-bridge control, one of ordinary skill in the art would not look to a current detector for the provision of such a feature.

Applicants thus respectfully believe that the rejection of claims 1-7 under 35 U.S.C. §103(a) over the disclosures by Hale et al. and Ashley et al. is overcome, and respectfully request that it be reconsidered and withdrawn.

The Office Action states that claims 1-7 are rejected under 35 U.S.C. §103(a) as being unpatentable over Baker (U.S. Patent No. 6,445,530) in view of Ashley et al. In particular, the Office Action states that Baker discloses substantially that which is disclosed by Hale et al., and when combined with the disclosure by Ashley et al., teaches all the claim limitations in an obvious combination. The rejection is respectfully traversed.

As discussed above with respect to the disclosures by Hale et al. and Ashley et al., the combination of Baker and Ashley et al. do not teach or suggest all of the claim limitations recited in claims 1-7, including IC output terminals connected to the control electrodes of the high side MOSFETs, a conductive plate for supporting the first and second high side MOSFETs and the IC, and a common insulating housing enclosing the first and second MOSFETs and IC. In addition, Applicants submit that it would not be obvious to combine the disclosures by Baker and Ashley et al. to arrive at the invention recited in claims 1-7 of the present invention. That is, Baker apparently teaches an H bridge with current sensing MOSFETs, without any discussion of heat conduction, while Ashley et al. appear to teach a stand alone current detector. Even if the disclosure by Baker taught or suggested increased heat conduction, which it does not appear to do, one of ordinary skill in the art would not look to Ashley et al. for a solution because only a lone current detector is disclosed.

For all the above reasons, Applicants respectfully submit that the disclosures by Baker and Ashley et al. do not form the basis for a *prima facie* case of obviousness, either individually or when combined. Accordingly, Applicants respectfully submit that the rejection of claims 1-7 under 35 U.S.C. §103(a) over the disclosures by Baker and Ashley et al. is overcome, and respectfully requests that it be reconsidered and withdrawn.

CONCLUSION

Applicants respectfully believe that the present response addresses all issues raised in the most recent Office Action. Furthermore, in view of the above discussion, Applicants respectfully believe that the application is now in condition for allowance, and earnestly solicit notice to that

effect. If it is believed that an interview would contribute to progress in the application, the Examiner is requested to contact the undersigned counsel at the number provided below.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on February 2, 2004

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February 2, 2004

Date of Signature

Respectfully submitted,

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